

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
NORTHERN DIVISION

NICOLE WRAY, et al.

PLAINTIFFS

VS.

NO. 3:18-cv-622-DPJ-FKB

GEICO INDEMNITY COMPANY, et al.

DEFENDANTS

**Defendant's Privilege Log**

DATE	BATES NO.	AUTHOR	RECIPIENTS	DESCRIPTION	PRIVILEGE
Unknown. Word Document, date changes when printed	501	Jennifer East	T. Daniel	Settlement negotiations and discussions regarding making sure Medicaid's interests are protected.	Document unrelated to this claim. Seems to have been saved in the wrong file.

DATE	BATES NO.	AUTHOR	RECIPIENTS	DESCRIPTION	PRIVILEGE
9/12/2018-9/25/2019	586-597	Chad, Stanley, Jennifer Phillips, Bryan Darity, Scott Brooks, Michael McCarthy, Chad Blaxton, Shannon Davis, Rachel Foskey	Atlas System	Litigation. Notes made by adjusters and claims managers in Atlas System discussing lawsuit with adjusters and defense counsel following notification of lawsuit being filed.	Work-Product (mental impressions and notes) and Attorney-Client Privilege
4/23/2018	598 1:11pm	Channing Nguyen	Atlas System	Reserving/File transfer	Work-Product (mental impression and notes) and Attorney-Client Privilege
4/19/2018	599-600 4:00pm	Aillene Blackwell-Jones	Atlas System	Reserving/File transfer	Work-Product (mental impression and notes) and Attorney-Client Privilege
12/22/2016	607 5:26 pm	Heather Guiffra	Atlas System	Manager Review Authority Update	Work-Product (mental impression and notes) and Attorney-Client Privilege

DATE	BATES NO.	AUTHOR	RECIPIENTS	DESCRIPTION	PRIVILEGE
12/22/2016	607 3:35pm	Heather Giuffra	Atlas System	Reserve request approved	Work-Product (mental impression and notes) and Attorney-Client Privilege
12/22/2016	607 3:13pm	Nack Lima	Atlas System	Reserve request adjustment	Work-Product (mental impression and notes) and Attorney-Client Privilege
12/22/2016	607-608 3:06pm	Atlas System	Atlas System	Reserve adjustment	Work-Product (mental impression and notes) and Attorney-Client Privilege
10/27/2016	609-610 10:59am	Atlas System	Atlas System	Reserve adjustment (Sterdivant)	Work-Product (mental impression and notes) and Attorney-Client Privilege
10/27/2016	610 10:58am	Heather Giuffra	Atlas System	Manager Review Authority Update	Work-Product (mental impression and notes) and Attorney-Client Privilege

DATE	BATES NO.	AUTHOR	RECIPIENTS	DESCRIPTION	PRIVILEGE
10/19/2016	610 2:43pm	Crystal Fuentes	Atlas System	Evaluation for Sterdivant	Work-Product (mental impression and notes) and Attorney-Client Privilege
9/21/2016	610 4:30pm	Crystal Fuentes	Atlas System	Evaluation for Sterdivant	Work-Product (mental impression and notes) and Attorney-Client Privilege
9/13/2016	611-612 9:59am	Julie Crowell	Atlas System	Reserve/File transfer review	Work-Product (mental impression and notes) and Attorney-Client Privilege
7/7/2016	614 12:31pm	Atlas System	Atlas System	Reserve adjustment	Work-Product (mental impression and notes) and Attorney-Client Privilege
3/14/2016	621-622 12:49pm	Dawn Martina	Atlas System	Other loss information for Sterdivant	Work-Product (mental impression and notes) and Attorney-Client Privilege

DATE	BATES NO.	AUTHOR	RECIPIENTS	DESCRIPTION	PRIVILEGE
01/07/2016	623 6:51pm	System User	Atlas System	Payments/Reserving Exposure Transfer	Work-Product (mental impression and notes) and Attorney-Client Privilege
01/07/2016	623 6:44 pm	System User	Atlas System	Payments/Reserving Exposure Transfer	Work-Product (mental impression and notes) and Attorney-Client Privilege
12/20/2015	624-625 5:42pm	Tiffany White	Atlas System	Reserve adjustment (Wray) Reserve adjustment (Sterdivant)	Work-Product (mental impression and notes) and Attorney-Client Privilege
12/20/2015	624-625 5:41pm	Atlas System	Atlas System	Reserve adjustment (Wray) Reserve adjustment (Sterdivant)	Work-Product (mental impression and notes) and Attorney-Client Privilege
12/17/2015	625 2:30pm	Jennifer East	Atlas System	Other loss information for Sterdivant	Work-Product (mental impression and notes) and Attorney-Client Privilege

DATE	BATES NO.	AUTHOR	RECIPIENTS	DESCRIPTION	PRIVILEGE
12/15/2015	625 7:30pm	Tiffany White	Atlas System	Payments/Reserving	Work-Product (mental impression and notes) and Attorney-Client Privilege
11/2/2015	630 1:08pm	Atlas System	Atlas System	Payments/Reserving	Work-Product (mental impression and notes) and Attorney-Client Privilege
10/20/2015	632-633 11:41am	Jennifer East	Atlas System	Payments/Reserving Creating stat reserve Stacking notes (Sterdivant)	Work-Product (mental impression and notes) and Attorney-Client Privilege
9/30/2015	649 11:53am	Daniel Stapp	Atlas System	Payments/Reserving Exposure Transfer	Work-Product (mental impression and notes) and Attorney-Client Privilege
9/30/2015	650 11:37am	Yofunmi Fageyinbo	Atlas System	Payments/Reserving Creating stat reserve coverage notes	Work-Product (mental impression and notes) and Attorney-Client Privilege

<b>DATE</b>	<b>BATES NO.</b>	<b>AUTHOR</b>	<b>RECIPIENTS</b>	<b>DESCRIPTION</b>	<b>PRIVILEGE</b>
9/29/2015	651-652 3:08pm	Traesten Dave	Atlas System	Payments/Reserving Exposure transfer, Exposure created	Work-Product (mental impression and notes) and Attorney-Client Privilege